

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re: Thomas Brown, : Bankruptcy Case No.: 19-22928-TPA

Debtor. : Chapter 13

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Thomas Brown : Document No.:

Movant, : Related to Document No.:

v. : Related to Claim No.: 1

Select Portfolio Servicing, Inc., :

Respondent. :

**DEBTOR'S DECLARATION OF SUFFICIENT PLAN FUNDING**

Pursuant with the Notice of Mortgage Payment Change filed on April 1, 2020, after reasonable investigation and upon review of the existing Chapter 13 Plan, it appears to Debtor that the existing payment is sufficient to fund the Plan even with the proposed change for April 25, 2020.

The new post-petition monthly payment payable to Respondent is \$285.07, effective April 25, 2020, per the notice dated April 1, 2020. The Debtor's Plan payment provides for a monthly payment to ABS Loan Trust V of \$313.28. Therefore, Debtor's Plan remains sufficient.

Respectfully Submitted,

Date: April 1, 2020

/s/Brian C. Thompson

Brian C. Thompson, Esquire

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